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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S MOTION  
FOR RECONSIDERATION OF ORDER  
GRANTING IN PART AND DENYING IN  
PART ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL (DKT. 2393)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Plaintiff Waymo LLC’s Motion for  
7 Reconsideration of Order Granting in Part and Denying in Part Administrative Motion to File Under  
8 Seal (Dkt. 2393) (“Motion for Reconsideration”). The Motion for Reconsideration seeks an order  
9 sealing limited portions of exhibits for which the Court denied sealing.

10 3. The portions of Waymo’s Opposition to Uber’s Motion to Compel Production of  
11 Documents (previously filed at Dkt. 1048-4) marked in red boxes on page 1 of the sealed version filed  
12 concurrently herewith as Exhibit A (in addition to passages previously granted sealing) disclose highly  
13 sensitive and confidential information about Waymo’s potential business models as well as its current  
14 and potential business and partnership plans. I understand that public disclosure of such specific  
15 business strategy information would enable competitors to unfairly tailor their own business strategy  
16 based on Waymo’s confidential business strategy and plans, which would cause Waymo significant  
17 competitive harm.

18 4. The portions of the July 26, 2017 Deposition Transcript of Jennifer Haroon (previously  
19 filed as Exhibit 3 at Dkt. 1048-9) marked in red boxes in the sealed version filed concurrently  
20 herewith as Exhibit B (specifically, at deposition pages and lines 108:6,25; 124:1,6, in addition to  
21 passages previously granted sealing) disclose highly sensitive and confidential information about its  
22 current and potential business models and plans. I understand that public disclosure of such specific  
23 business strategy information would enable competitors to unfairly tailor their own business strategy  
24 based on Waymo’s confidential business models and plans, which would cause Waymo significant  
25 competitive harm.

26 5. The portions of the July 17, 2017 Deposition Transcript of Larry Page (previously filed  
27 as Exhibit 1 at Dkt. 1114-2/1068-5) marked in red boxes in the sealed version filed concurrently  
28 herewith as Exhibit C (specifically, at deposition pages and lines 97:5,25; 108:19; 183:10; 214:21,25;

1 215:6, in addition to passages previously granted sealing) disclose highly sensitive and confidential  
2 information about its potential business models as well as its current and potential business and  
3 partnership plans. I understand that public disclosure of such detailed business strategy information  
4 would enable competitors to unfairly tailor their own business strategy based on Waymo's  
5 confidential business strategy and plans, which would cause Waymo significant competitive harm.

6 6. The portions of the July 24, 2017 and July 25, 2017 Deposition Transcripts of Bryan  
7 Salesky (previously filed as Exhibit 4 at Dkt. 1114-5/1068-10) marked in red boxes in the sealed  
8 version filed concurrently herewith as Exhibit D (specifically, at deposition pages and lines 145:2;  
9 146:2,5; 148:6,12; 151:1,3,7-8; 247:2) disclose highly sensitive and confidential information about its  
10 financial valuation as well as its current and potential business and partnership plans, including the  
11 confidential identities of third parties involved in those plans. I understand that public disclosure of  
12 such detailed business strategy information would enable competitors to unfairly tailor their own  
13 business strategy based on Waymo's confidential business strategy and plans, which would cause  
14 Waymo significant competitive harm.

15 7. The portions of the document bearing Bates stamp WAYMO-UBER-00026174  
16 (previously filed as Exhibit 5 at Dkt. 1068-11) marked in red boxes in the sealed version filed  
17 concurrently herewith as Exhibit E disclose the confidential email address of a senior Google  
18 executive. I understand that public disclosure of such email addresses would cause Waymo and that  
19 executive substantial harm due to the high public profile of this litigation.

20 8. The portions of the document bearing Bates stamps WAYMO-UBER-00008935 to  
21 WAYMO-UBER-00008939 (previously filed as Exhibit 4 at Dkt. 1105-4/1080-10) marked in red  
22 boxes in the sealed version filed concurrently herewith as Exhibit F (specifically, at pages WAYMO-  
23 UBER-00008937 to WAYMO-UBER-00008938) disclose highly sensitive and confidential  
24 information about its business plans and policies. I understand that public disclosure of such detailed  
25 business strategy information would enable competitors to unfairly tailor their own business strategy  
26 based on Waymo's confidential business plans and policies, which would cause Waymo significant  
27 competitive harm.

